

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

Defendant.

## STIPULATION AND ORDER MODIFYING CONDITIONS OF PRE-TRIAL RELEASE

The United States of America through its counsel, Assistant United States Attorney VERONICA M.A. ALEGRÍA, together with counsel for defendant ANDREW VANG, TODD LERAS, Esq., counsel for defendant TOU SUE VANG, Assistant Federal Defender DOUGLAS BEEVERS, and undersigned counsel for MONICA MOUA, hereby agree to the following:

1. Ms. Moua is out of custody. (ECF Nos. 36, 37.) Two of her co-defendants are also her sons: co-defendant Andrew Vang and co-defendant Tou Sue Vang. Both Andrew Vang and Tou Sue Vang are incarcerated in pre-trial detention. (ECF Nos. 38, 72.)
2. One of the pre-trial release conditions (number 9) for Ms. Moua is as follows:

You must not associate or have any contact with your co-defendants, including immediate family members, unless in the presence of counsel or otherwise

approved in advance by the Pretrial Services Officer. (ECF No. 33 (emphasis in original).)

3. The parties agree to modify this condition to allow mother and her sons to speak with each other as follows:

You must not associate or have any contact with any of your co-defendants (except for co-defendants Andrew Vang and Tou Sue Vang), unless in the presence of counsel or otherwise approved in advance by the Pretrial Services Officer. You shall be permitted to communicate with Andrew Vang and Tou Sue Vang. However, you may not discuss your current federal case with Andrew Vang or Tou Sue Vang without the presence of defense counsel.

Dated: September 15, 2023

/s/ Shari Rusk

SHARI RUSK  
Attorney for Defendant  
MONICA MOUA

/s/ Todd Leras

TODD LERAS  
Attorney for Defendant  
ANDREW VANG

/s/ Doug Beevers

DOUGLAS BEEVERS  
Attorney for Defendant  
TOU SUE VANG

/s/ Veronica Alegria

VERONICA M.A. ALEGRÍA  
Assistant United States Attorney

cc: DARRYL WALKER, PTSO

### **ORDER**

It is so ordered that Monica Moua's pre-trial release condition be modified as follows:

You must not associate or have any contact with any of your co-defendants (except for co-defendants Andrew Vang and Tou Sue Vang), unless in the presence of counsel or otherwise approved in advance by the Pretrial Services Officer. You shall be permitted to communicate with Andrew Vang and Tou Sue

Vang. However, you may not discuss your current federal case with Andrew Vang or Tou Sue Vang without the presence of defense counsel.

Dated: October 3, 2023



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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE